

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION

KRIS CRUTCHER, and TRI-LAKES  
DIAGNOSTIC IMAGING, LLC,

Plaintiffs,

v.

Case No.: 6:15-cv-03484-MDH

MULTIPLAN, INC., and PRIVATE  
HEALTHCARE SYSTEMS, INC.,

Defendants.

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**PLAINTIFFS' MOTION TO COMPEL  
DEFENDANTS TO PRODUCE DOCUMENTS AND MATERIALS**

Plaintiffs, KRIS CRUTCHER (hereafter “CRUTCHER”) and TRI-LAKES DIAGNOSTIC IMAGING, LLC (hereafter “TRI-LAKES”), pursuant to Fed. R. Civ. P. 37 and Local Rule 37.1, hereby move this Court for an Order compelling the Defendants, MULTIPLAN, INC. (“MULTIPLAN”) and PRIVATE HEALTHCARE SYSTEMS, INC. (“PHCS”) to produce documents and materials responsive to the Plaintiffs’ First Requests for Production to PHCS and Plaintiffs’ First and Second Requests for Production to MULTIPLAN, as more fully set forth in Plaintiffs’ accompanying Suggestions in Support of this Motion.

For the reasons set forth in the Plaintiffs’ Suggestions in Support of this Motion, Plaintiffs respectfully request that this Honorable Court enter an order compelling Defendant PHCS to produce documents and materials responsive to Request Numbers 9, 18, and 21 of Plaintiffs’ First Request for Production to PHCS, and compelling Defendant MULTIPLAN to produce documents and materials responsive to Request Numbers 12, 13, 15, 23, and 27 of Plaintiffs’ First Request

for Production to MULTIPLAN, and Request Numbers 1-6 of Plaintiffs' Second Request for Production to MULTIPLAN, and for such other relief as this Court deems just and proper.

Respectfully submitted this 17th day of October, 2017,

*/s/*David P. Mitchell  
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Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of October, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

*/s/*David P. Mitchell  
David P. Mitchell, Esq.